

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI

H&R BLOCK, INC. and HRB INNOVATIONS,
INC.

Plaintiffs,

v.

BLOCK, INC.,

Defendant.

Case No. 4:21-cv-00913-GAF

**DECLARATION OF JEFFREY J. JONES II IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, Jeffrey J. Jones II hereby declare as follows:

1. I am the President and Chief Executive Officer of H&R Block, Inc. (together with its subsidiaries and affiliates, including HRB Innovations, Inc., "Block"). I have served in this capacity for just over four years. I am over the age of 18 and competent to testify.

2. I submit this declaration in support of Block's motion for a preliminary injunction against Block, Inc., based on my personal knowledge and a review of company records, and on information from individuals at Block upon whom I regularly rely.


I. Block and Its BLOCK Family of Marks

3. In 1955, brothers Henry and Richard Bloch transformed their bookkeeping business into a new company that specialized in income tax preparation. They called their company "H&R Block."

4. More than 65 years later, Block is a market leader and a brand icon in tax and other financial services, with over 9,000 company-owned and franchised locations in the United States alone, and nearly 1,500 additional offices in Canada and Australia. Block is one of the world's largest tax preparation companies, and has prepared more than 800 million tax returns for its customers. In the past six-plus decades, Block has expanded its services from tax preparation to a variety of other financial services, including multiple free and paid tax filing products, refund advance loans, refund transfers, prepaid debit cards, lines of credit, providing credit scores, mobile banking platforms, tax refund identity theft protection, and small business services. Block already offers a number of these services through its MyBlock mobile app, and has announced that, in January 2022, it will launch a new, innovative financial technology platform, SPRUCE, which will combine the best features of leading digital banks with Block's trusted brand and insights, gleaned from helping millions of customers every year. The SPRUCE financial technology platform will be promoted as having been "built by H&R Block."

5. Block offers its services under a family of marks (the "BLOCK Marks"), including a number for which it owns United States trademark registrations. Among those registrations are the following (true and correct copies of which are attached to this declaration as Exhibit A):

Mark	Reg. No.	Reg. Date.	Services/Goods
H&R BLOCK	3,338,962	Nov. 20, 2007	Preparation of tax returns for others; financial planning services; conducting classes and courses in preparation of tax returns.
H&R BLOCK EMERALD CARD	3,392,368	Mar. 4, 2008	Debit card and credit card services.

Mark	Reg. No.	Reg. Date.	Services/Goods
H&R BLOCK EMERALD SAVINGS	3,525,361	Oct. 28, 2008	Savings account services.
H&R BLOCK EMERALD ADVANCE	3,532,084	Nov. 11, 2008	Financial services, namely, debit and credit card services, loan financing and financing lines of credit.
BLOCKWORKS	4,769,331	Jul. 7, 2015	Computer software for tax return preparation, tax planning, tax calculation, and tax return filing and associated instructional manuals and other printed instructional materials sold as a unit therewith.
BLOCK ADVISORS	5,055,458	Oct. 4, 2016	Tax return preparation for others; tax planning services; business management and consulting services; accounting services; bookkeeping; and payroll services for others, namely, payroll preparation and payroll processing.
 The logo for BLOCK Advisors, featuring the word "BLOCK" in green above the word "Advisors" in grey, with a green 3D cube icon to the right.	5,179,142	Apr. 11, 2017	Tax return preparation for others; tax planning services; business management and consulting services; accounting services; budgeting services; bill paying services; and payroll services for others, namely, payroll preparation and payroll processing services.
BLOCK HAS YOUR BACK	6,003,605	Mar. 3, 2020	Preparation of tax returns for others.

6. Block promotes and provides its services under the BLOCK Marks on its websites including <https://hrblock.com/> and <https://blockadvisors.com/>. It also promotes its brand on Twitter under the handles @hrblock, @hrblocknews and @hrblockanswers. Under the @hrblockanswers handle, Block answers questions using the BLOCK ANSWERS logo, shown

below. Block also promotes its services on Facebook under the name @hrblock; on Instagram under the name @hrblock; and on LinkedIn at <https://www.linkedin.com/company/h&r-block/>.



7. Block has made significant investment to develop its brand identity, including through community outreach programs and national advertising campaigns on television, in print, on the radio, on the Internet, and on social media channels, including Twitter, Instagram, Facebook and LinkedIn. Over the last three years alone, Block has spent nearly half a billion dollars advertising its products and services under the BLOCK Marks.

8. Through these campaigns, in addition to using the BLOCK Marks to promote its products and services, Block has prominently identified itself simply as BLOCK to promote its consumer services. In online videos and national television commercials, Block has used the following phrases:

- “Block can help you skip right to the money you want.”
- “At Block, it’s all about you.”
- “Block has your back.”
- “At Block, one thousand people win \$1000 every day.”
- “I’m going to Block.”
- “You could get an advance up to \$1250. No interest when you file at Block.” “No interest when you file at Block.”
- “Switch to Block and pay half.”
- “Block is free.”

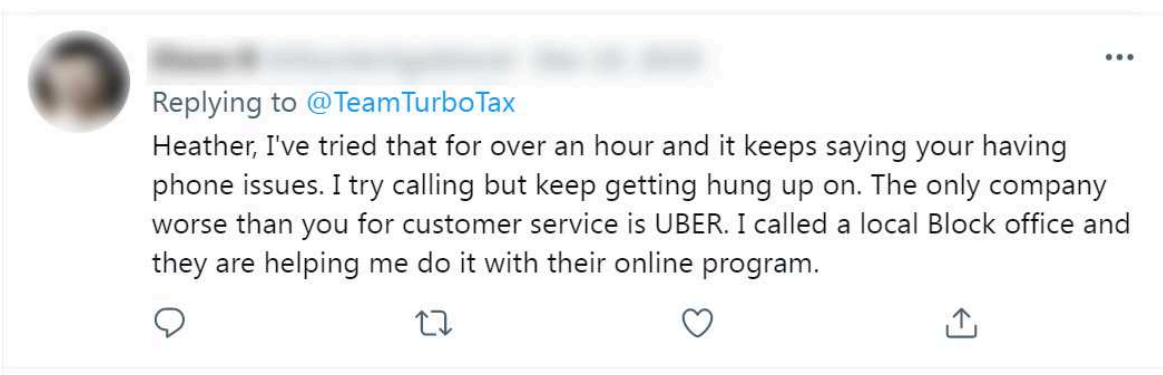
Block has also used the below images with BLOCK alone in online display advertising, on social media, television commercials, press releases, and coupon flyers, among other uses:



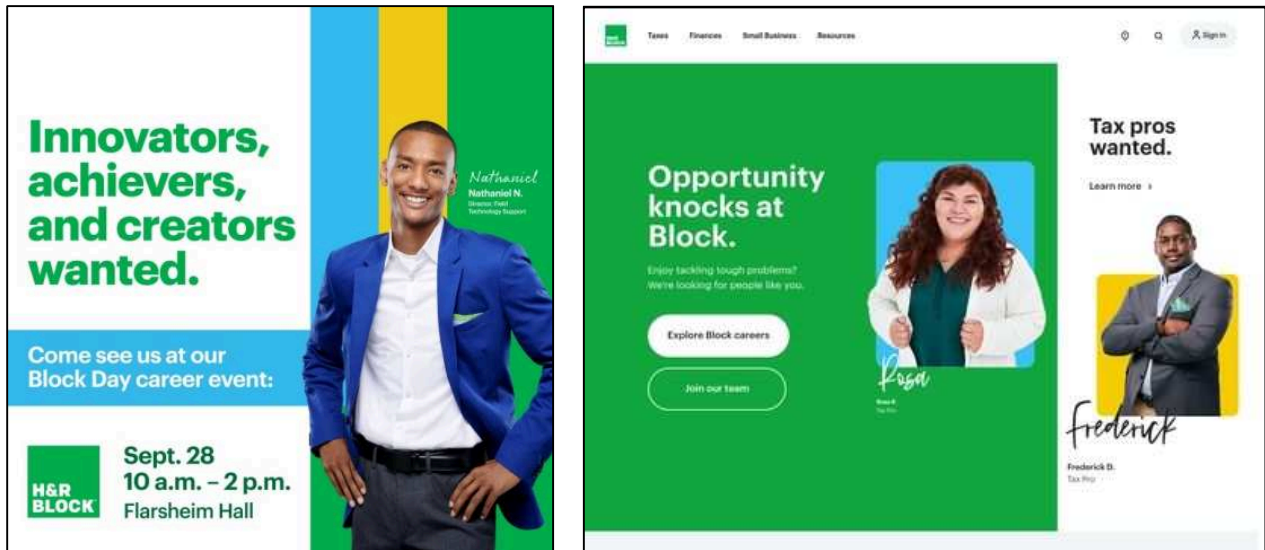
9. Among the BLOCK Marks is “MyBlock,” the online account and mobile app (shown at right) that consumers can use to get support from their Block tax professionals, access credit scores, manage their Tax Identity Shield membership (which helps protect against identity theft tax refund fraud), upload receipts, donations, and other tax-related items, and access other financial services, such as manage their H&R BLOCK EMERALD CARD prepaid debit payments card.



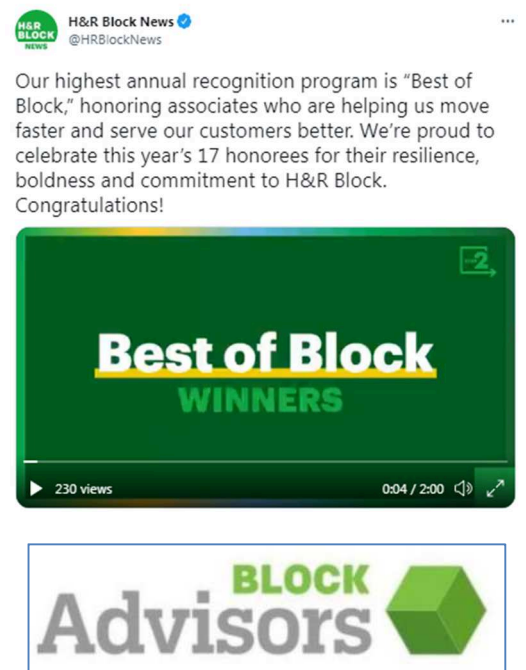
10. As these many examples show, although our formal name is H&R Block, we frequently refer to ourselves as BLOCK alone in consumer-facing advertising and promotion. Being known colloquially as BLOCK alone is important to our branding and marketing because it is a more contemporary way for us to refer to our company and brand. This more contemporary branding has taken hold with customers, who refer to the local offices where they go for Block's services as "Block" offices, such as in the examples below (and attached to this declaration as Exhibit B).



11. In addition to advertising its consumer services under the BLOCK Marks, Block refers to itself as BLOCK in recruiting new employees, such as inviting them to come to “Block Day” career events, and explaining that “Opportunity knocks at Block” as shown below:



12. In connection with recruiting full-time and seasonal employees, Block also uses the phrases: “You’ve got Block potential”; “You’d rock at Block”; and “Make a difference at Block.” Employees who go above and beyond in demonstrating Block’s values can be awarded the title of “BLOCK MVP,” and “BEST OF BLOCK,” and featured on Block’s social media channels. In my experience, Block employees frequently refer to their employer as “Block.”



13. In connection with its small business services and advice, Block uses the BLOCK ADVISORS registered trademark (Reg. No. 5,055,458) and the BLOCK ADVISORS and design registered trademark (Reg. No. 5,179,142, shown above). Block has over 300 BLOCK

ADVISORS offices that serve more complex clients in both the small business and consumer spaces, and provide tax, bookkeeping, and payroll services. In addition, Block offers small business services through BLOCK ADVISORS small business certified tax professionals in its Block retail offices. In 2021 alone, Block served more than two million small businesses, many under the BLOCK ADVISORS brand.

14. In 2020, Block announced “Block Horizons 2025,” Block’s five-year growth and transformation strategy focused on three imperatives: Small Business, Financial Products, and the “Block Experience.” The program will leverage Block’s client relationships and technology platforms to accelerate growth in small business and financial products, and will continue to modernize the consumer tax business to combine digital tools with human expertise and care. Block Horizons also will help provide access to financial services for customers who are “underbanked” (meaning, for example, consumers who do not have a relationship with a traditional bank because they do not trust such banks, find them inconvenient to use, or cannot afford the fees and minimums). Block advertised the “Block Horizons” strategy through its website, its LinkedIn and various media outlets, advertising that “There’s a bigger, better Block on the horizon,” and continues to use it as an anchor for its investor messaging. As part of the Block Horizons 2025 corporate growth strategy, Block has announced that it will launch its SPRUCE financial technology platform in early 2022, which will provide consumers with a mobile banking platform and the ability to set and monitor savings goals, earn cash back on everyday purchases, get free credit scores, and get paychecks up to two days early with direct deposit.



15. In addition to the tax and other financial services offered under the BLOCK Marks, in December

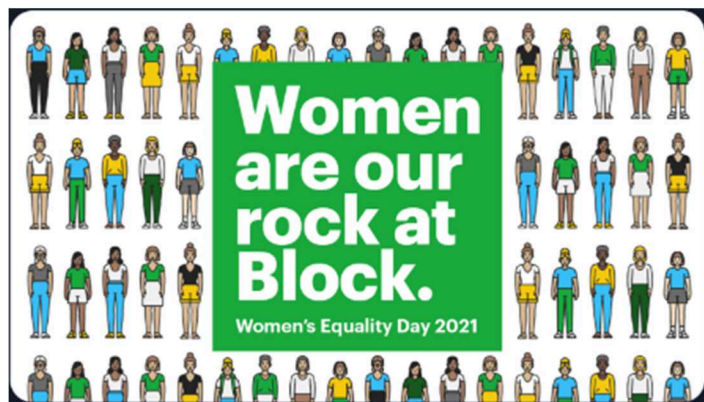
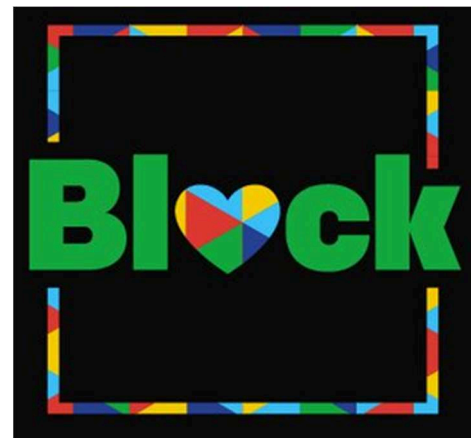


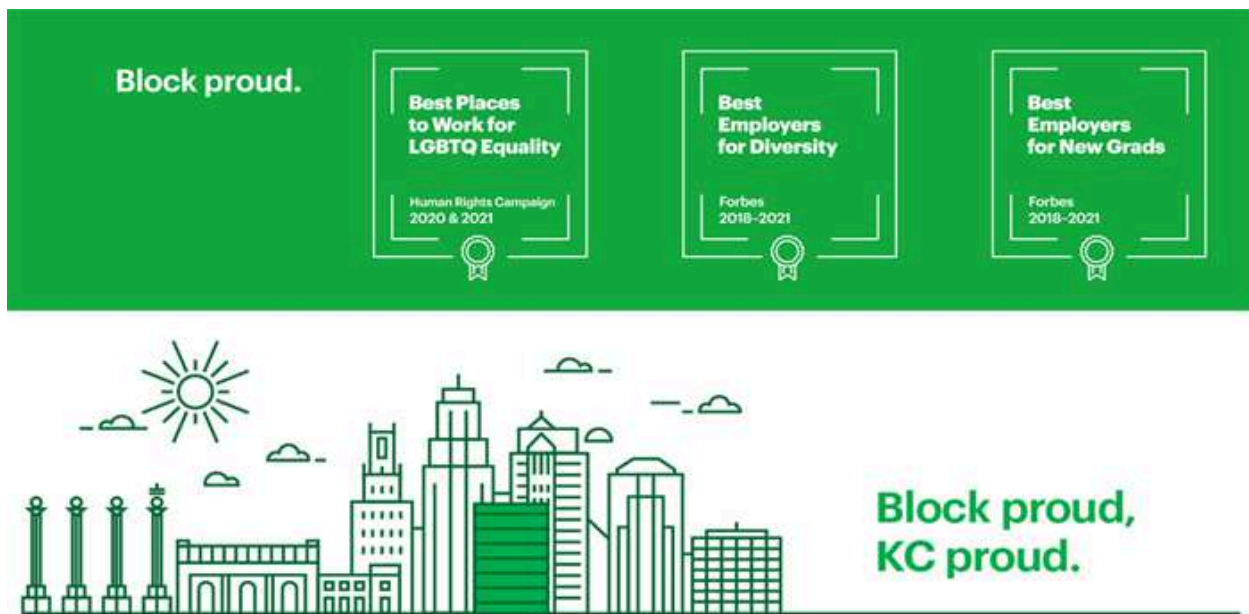
Make Every
Block Better

2019, Block formed a charitable community impact program under the name MAKE EVERY BLOCK BETTER. Through this program, Block employees volunteer and give back to their local communities. Block partners with national organizations and those in its Kansas City hometown—such as Habitat for Humanity, Nextdoor, the Urban Neighborhood Initiative, the Neighborhoods Rising Fund, the Ewing Marion Kauffman Foundation, and the Urban League of Greater Kansas City—to build connections among neighbors and provide resources and support in communities through efforts such as donating to food pantries, increasing access to quality housing and better neighborhood spaces, enhancing shared community spaces, and supporting small businesses. Since the launch of MAKE EVERY BLOCK BETTER in December 2019, Block associates, franchisees, and franchise employees have recorded more than 205,000 volunteer hours and have supported more than 300,000 small business owners. Block promotes the MAKE EVERY BLOCK BETTER program with its BLOCK branding at its various community programs, such as with t-shirts and other branding, as shown below.



16. Block also uses the BLOCK Marks in connection with its diversity, inclusion, and belonging initiative, BELONGING@BLOCK, with a focus on building a culture where every associate has a voice and a sense of belonging. The initiative has already led to national recognition for pledging to achieve pay equality and gender equality, with Block being recognized in 2020 as one of the best places to work for LGBTQ equality by the Human Rights Campaign, being scored 100% on the Corporate Equality Index, and joining the Catalyst CEO Champions for Change pledge to increase the representation of women, including women of color, among senior leadership. Block promotes the BELONGING@BLOCK initiative on its social media pages under the BLOCK Marks, and with the phrase BLOCK PROUD as shown in the below examples. Block frequently uses the hashtags #BlockPride and #BelongingatBlock on its social media channels.





17. Although Block is aware of other companies that use BLOCK-formative marks, such as BLOCK & COMPANY, INC.—which offers real estate brokerage services in the Kansas City area under a logo that is distinct from Block’s (shown at right)—Block is not aware of any companies with a national reach that use the “BLOCK” mark in connection with the types of tax preparation and other financial services that Block offers under its family of BLOCK Marks.




18. When other companies have used marks confusingly similar to the BLOCK Marks in connection with the types of tax preparation and other financial services that Block offers, Block has enforced its rights to swiftly put an end to the infringing use. For example, in 2005, Block filed in the United States District Court for the District of New Jersey a lawsuit against Tax Block, LLC for infringing the BLOCK Marks by using the TAX BLOCK mark. Shortly after Block filed the lawsuit, the court entered a consent judgment and permanent injunction enjoining the defendant from using BLOCK, TAX BLOCK, or any of Block’s other



protected trademarks. A true and correct copy of the consent judgment is attached to this declaration as Exhibit C.

19. Block also has successfully enforced its rights in the Block Marks against infringers that have used confusingly similar marks such as THINK OUTSIDE THE BLOCK, THINKING OUTSIDE THE BLOCK, and T&R BLOCK.

II. Block's Green Color Scheme and Green Square Logo

20. As shown in virtually all of the images reproduced above, Block consistently and prominently uses the color green in connection with its BLOCK Marks. Block also owns federally registered trademarks for its green square logo (the "Green Square Marks"), shown below (true and correct copies of which are attached as Exhibit D).

Mark	Reg. No.	Reg. Date.	Services/Goods
 H&R BLOCK [The trademark application indicates that "the mark consists in part of a green square." I understand that, at the time this application was filed, the Trademark Office did not accept filings with the actual color; instead, color was indicated through shading, as shown in the drawing above]	2,533,014	Jan. 22, 2002	Preparation of tax returns for others.

Mark	Reg. No.	Reg. Date.	Services/Goods
	3,656,593	July 21, 2009	Computer programs for use in the preparation of tax returns; tax advice and planning services; tax consultation; tax filing services; accounting consultation and accounting services; Financial planning services; banking services; and mortgage services, namely, mortgage banking, mortgage lending, mortgage brokering and mortgage servicing; Educational services, namely, conducting classes and courses in the field of tax preparation and distribution of course materials in connection therewith; Providing online non-downloadable software for use in the preparation of tax returns.
	5,179,142	Apr. 11, 2017	Tax return preparation for others; tax planning services; business management and consulting services; accounting services; budgeting services; bill paying services; and payroll services for others, namely, payroll preparation and payroll processing services.

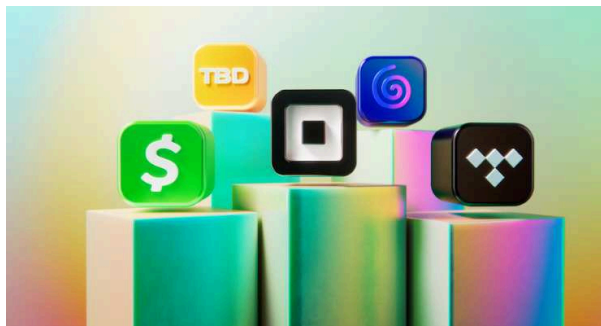
21. As an extension of its green branding, Block offers the H&R BLOCK EMERALD CARD prepaid MasterCard, which allows customers to deposit money onto a prepaid debit card (including direct deposit of tax refunds and payroll). The Emerald Card can be used as an everyday account to pay bills and to make purchases anywhere Mastercard® debit cards are accepted. The Emerald Card is the fourth most popular prepaid debit card in the United States. Block also offers the Emerald Savings account (which can be used in conjunction with the Emerald Card to make deposits and withdrawals), and Emerald Advance (a line of credit with year-round access). Consumers can manage their Emerald Card and Emerald Savings accounts

through Block's MyBlock mobile app or through the login page on Block's website (<https://hrblock.com/emeraldcard>).

III. Block, Inc.'s Infringing Re-Branding as "Block"

22. On December 1, 2021, Block, Inc., formerly known as Square, Inc., publicly announced that it was changing its name to "Block, Inc." In the "About Block" section of its press release, Block, Inc. describes the company as "a global technology company with a focus on financial services." Block, Inc.'s CEO, Jack Dorsey, stated: "Block is a new name, but our purpose of economic empowerment remains the same. No matter how we grow or change, we will continue to build tools to help increase access to the economy." The press release also stated that Block, Inc. selected the name BLOCK because of its association with "building blocks, neighborhood blocks and their local businesses, communities coming together at block parties full of music, a blockchain, a section of code, and obstacles to overcome." Block, Inc.'s businesses include offering tax preparation and other financial services, such as prepaid debit cards, bank accounts, and payroll services that include the payment of payroll taxes. A true and correct copy of the December 1, 2021 press release is attached to this declaration as Exhibit E.

23. Block, Inc. has launched a website at <https://block.xyz>, which identifies its brands, including Square and Cash App, as the "building blocks" of the BLOCK brand. Block, Inc.'s website



(<https://block.xyz/mediakit>) visually depicts its brands as "building blocks" (as shown above), and the homepage includes a music playlist called "BLOCK VIBES." The bottom of the homepage includes trademark notice that states "BLOCK and the Block Logo are trademarks of

Block, Inc.” A true and correct printout of Block, Inc.’s block.xyz website (<https://block.xyz>) is attached to this declaration as Exhibit F.

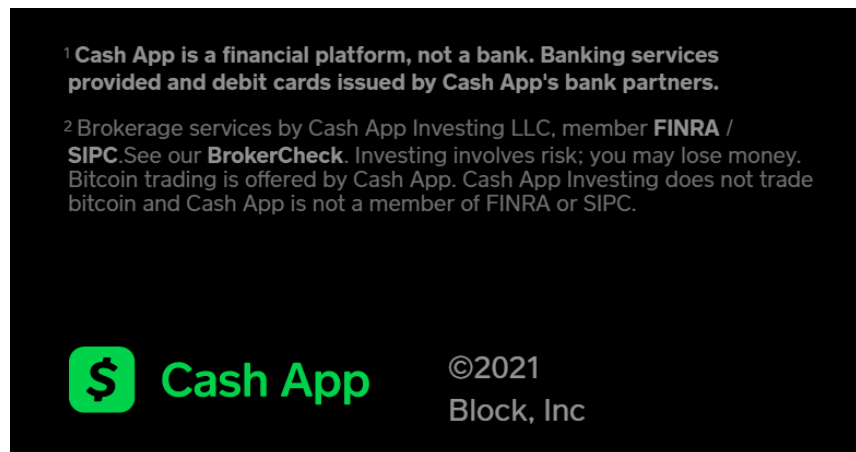
24. Block, Inc. also has a careers page on its website (<https://block.xyz/careers>) titled “WORK AT BLOCK,” which states: “Across each of our building blocks, we’re creating better tools to help everyone access the economy. Every challenge creates possibilities, and we need different perspectives to see them all. Bring yours to Block.” A true and correct printout of Block, Inc.’s careers page is attached to this declaration as Exhibit G.

25. Block, Inc. has established “BLOCK” social media accounts, including a “BLOCK” LinkedIn page with the tagline “joinblock” in the URL. Block, Inc.’s Twitter handle is “@blocks” and “@blockir.” Attached to this declaration as Exhibit H are true and correct printouts from Block, Inc.’s social media pages.

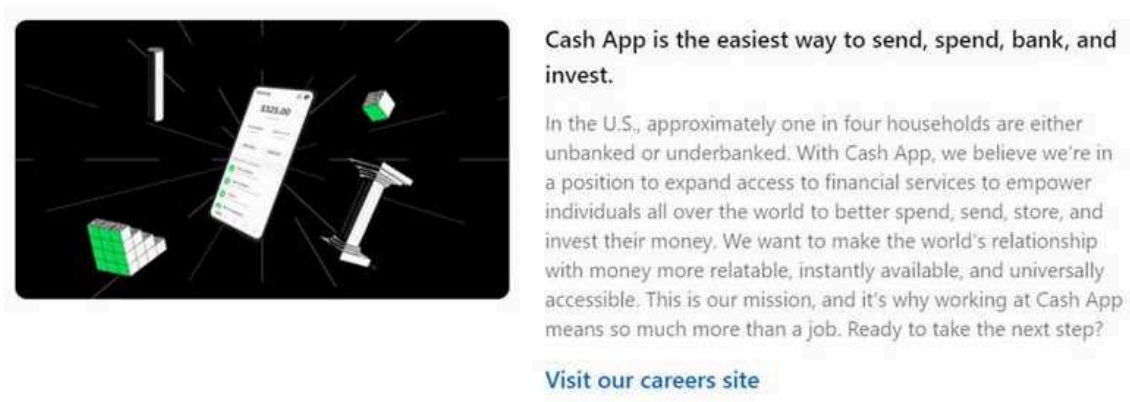
26. According to the December 1 press release, Block, Inc.’s Square brand “helps sellers run and grow their business with its integrated ecosystem of commerce solutions, business software, and banking services.” Square’s website (at <https://squareup.com/us/en/banking>) explains that, with Square, “[y]our payments, business banking accounts, and cash flow [are] synced together seamlessly.” Square also offers checking account services with a linked debit card.

27. I understand from the Cash App website (at <https://cash.app>) that it is a mobile payment service that offers users direct deposit, a debit card connected to the user’s balance that can be used anywhere Visa is accepted, and money transfer services. According to Block, Inc.’s most recent annual 10k report, Block, Inc. derives over 62% of its revenue from Cash App.

28. Block, Inc.'s Cash App uses a green square logo that is nearly identical in color and very similar in shape (a square with rounded corners, see below at right) to Block's federally registered Green Square Marks (as shown below at left). As of December 20, 2021, the Cash App website (<https://cash.app>) also shows that it is associated with Block, Inc.



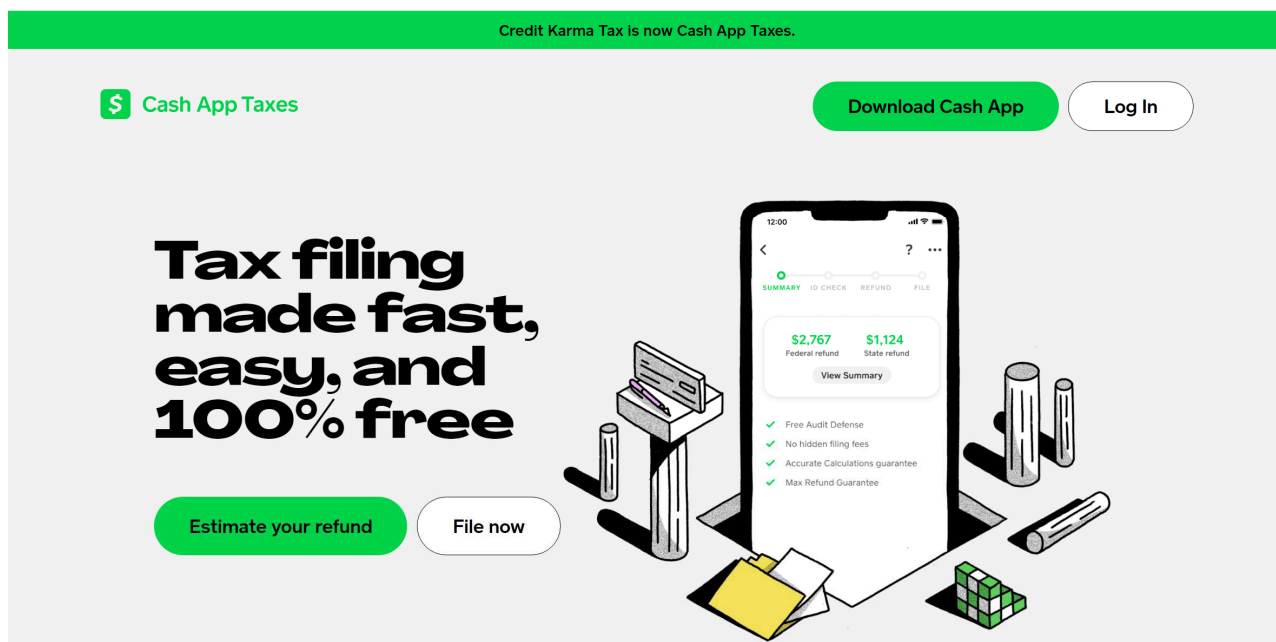
29. As Block strives to do, Cash App has stated that it also seeks to help underbanked consumers, as described on its LinkedIn page, shown below. Attached to this declaration as Exhibit I is a true and correct printout from Block, Inc.'s LinkedIn page of the below post.



30. On November 25, 2020, Square, Inc. (which has since been renamed Block, Inc.) announced that it entered into an agreement, on behalf of Cash App to acquire Credit Karma's tax business. The press release stated that "[t]he acquisition provides an opportunity to further

digitize and simplify the tax filing process in the United States, expanding access to the one in three households which are unbanked or underbanked.” The press release further explained that “[t]he tax product will expand Cash App’s diverse ecosystem of financial tools—which currently includes peer-to-peer payments, Cash Card, [and] direct deposit...giving customers another way to manage their finances from their pocket.” A true and correct copy of the press release is attached to this declaration as Exhibit J.

31. The Cash App Taxes’ website (<https://cash.app/taxes>) uses green branding that is similar to Block’s branding, and green squares that are similar to Block’s Green Square Marks. News reports from November 2021 stated that “Cash App is currently working on integrating the Credit Karma Tax platform,” and that “customers will access the tax prep software through Cash App instead of Credit Karma.” Attached to this declaration as Exhibit K is a true and correct copy of a Forbes Advisor article describing Cash App’s integration of Credit Karma. As shown below, as of December 20, 2021, the Cash App Taxes website states that “Credit Karma Tax is now Cash App Taxes.”



32. On December 1, 2021, Block, Inc. (under its then-name Square, Inc.) filed an application with the United States Patent and Trademark Office to register BLOCK as a trademark for use in connection with, among other services, “charitable services, namely, promoting public awareness about charitable, philanthropic, volunteer, public and community service and humanitarian activities.” Block, Inc. also has filed applications to register its block logos. Attached to this declaration as Exhibit L are true and correct copies of these trademark applications.

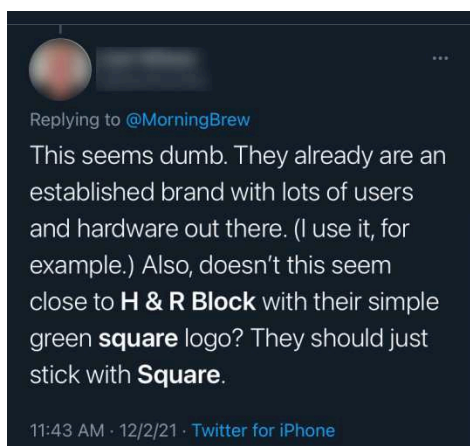
IV. Consumer Confusion Between Block, Inc.’s Use of “BLOCK” and Block’s Family of BLOCK Marks Is Inevitable

33. Given the similarities between the tax and other financial services offered by brands that form the building blocks of the Block, Inc. family of financial services companies (such as Square and Cash App) on the one hand, and the tax and other financial services offered by Block on the other, as well as the charitable services to be offered by Block, Inc. and that are currently offered by Block, all under the BLOCK name and marks, consumer confusion is inevitable.

34. In the two weeks since Block, Inc. changed its name to Block, Inc. and became known as BLOCK, there has been significant discussion on social media reflecting that consumers are drawing a link between the companies based on the confusingly similar names. For example, users have tweeted in response to Block, Inc.’s name change:

- “The square rebrand is surely going to piss off @HRBlock who do a lot of financial services stuff under the Block name.”
- “Are you talking about H&R Block?”
- “Have you ever heard of H&R Block? They are in the financial business as well. Did you know they refer to their business as the Block?”

- “[D]oesn’t this seem close to H&R Block with their simple green square logo?”
- “[I]sn’t that name already taken by HRBlock, which is already in the financial and banking sectors?”



Attached to this declaration as Exhibit M are true and accurate copies of these Tweets.

35. Similarly, on Reddit, Block, Inc.’s name change announcement prompted discussion underscoring the potential for confusion, with users writing:

- “Too bad. HRB is colloquially called Block.”¹
- “What about H&R Block? That’s what I think of when I hear “Block.”²

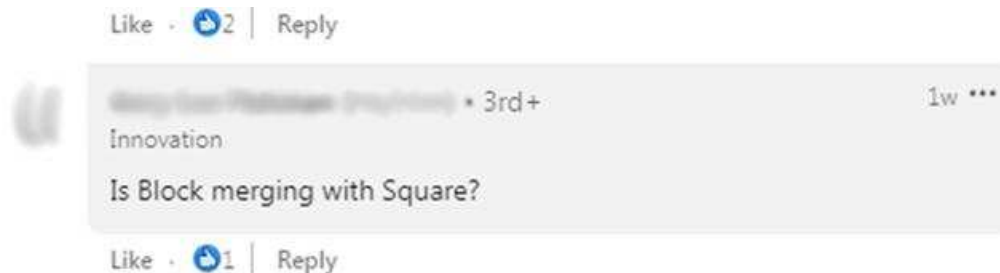
¹https://www.reddit.com/r/stocks/comments/r6pwhr/payments_giant_square_will_change_its_corporate/

- “When I read ‘Square rebrands as Block’ I had no idea what company it was. I know Square card reader and everything but just seeing ‘Square’ without context got me nowhere. I don’t think ‘Block’ is going to help me with brand recognition. I’ll just think someone is shortening H&R Block.”³



36. On Block’s LinkedIn page, one user questioned: “Is Block merging with Square?”

Exhibit N,



37. On a news program, after reviewing the allegations of the Complaint in this case, the news anchor commented: “I don’t dispute what H&R Block is saying. It is confusingly similar.” *See*

²https://www.reddit.com/r/stocks/comments/r6pwhr/payments_giant_square_will_change_its_corporate/

³https://www.reddit.com/r/CrappyDesign/comments/r7i022/square_rebrands_itself_as_block_this_is_from/

http://files.uspou.tveyes.com/MediaDownload/20211217/1079032/16373949.1391/NY1_12-17-2021_07.17.55.mp4.

38. Even employees in the Block, Inc. family of companies recognize the risk of confusion. For example, one of those employees tweeted: “Folks regularly mistook me working and [sic] Square Enix. Now, I’m pretty sure folks are now going to think I work for H&R Block.” Exhibit O.



39. Block, Inc., by using “BLOCK” as its name in connection with its tax and other financial services businesses, is creating a likelihood of confusion with Block’s tax and other financial services, and the BLOCK Marks. As Block, Inc. expands its financial offerings under the BLOCK brand of companies, and as its use of the BLOCK mark becomes more widespread, consumer confusion is inevitable. That is particularly true as Block, Inc.’s Cash App Taxes completes its integration of Credit Karma Tax and begins offering the same tax preparation services as Block, with its green color scheme and block logo.

V. Block Will Be Irreparably Harmed by Block, Inc.’s Use of “BLOCK”

40. Block, Inc.’s name change will deceive consumers into believing that there is some affiliation between Block and Block, Inc. Consumers may, for example, mistakenly believe that Block is one of the “building blocks” in the Block, Inc. family of financial services

companies. Many of our customers are not necessarily well-versed about corporate affiliations (including, but not limited to, our underbanked customer) and may therefore be particularly susceptible to confusion. The harm caused by consumer confusion, while real and irreparable, will be difficult to quantify.

41. Block has earned a reputation for high-quality service and reliability by meeting customers' needs with respect to their most sensitive financial information for decades. This reputation for trust and reliability—and the vast customer goodwill it represents—is of enormous value to Block both in its core tax preparation business and as it offers expanding and innovative financial services. Block, Inc.'s decision to use our name for competing services will enable it to trade off the goodwill we have earned instead of earning its own reputation. The harm caused by a competitor unfairly leveraging our goodwill and reputation is likewise irreparable and difficult to quantify.

42. Block, Inc.'s use of our name will also hamper our ability to control our own image and perception. For example, when consumers see news stories that refer to Block, Inc. as “Block” (like the one shown at right and



attached as Exhibit P) they may mistakenly believe that the stories are about us. We would not want the public to believe that our CFO “[b]elieves that bitcoin should be a part of every major company’s financial war chest.” This is just one illustration of how perceptions about Block, Inc. will be incorrectly attributed to us, thereby causing us to lose control of the associations people have about our brand, which will cause further irreparable harm.

43. Block has approximately 3,000 franchised offices that are independently owned and operated, and each franchisee is a small business owner who will be irreparably harmed from any damage to Block.

44. In addition, Block has no means of controlling the quality of Block, Inc.'s advertised offerings under the BLOCK mark. If Block, Inc.'s BLOCK services or products are not consistent with the high quality of Block's services and products, there is a substantial risk that consumers who are confused as to the source of Block, Inc.'s BLOCK



and dissatisfied with its quality may incorrectly form a negative view of Block, as shown by the Tweet above. This is particularly so given that Block, Inc. occupies the same markets that Block currently occupies. By its nature, such harm is irreparable.

45. As just one example of the risk of harm to Block, consider what might happen if there is a data breach of Block, Inc. If the media were to report that Block, Inc., or Block, Inc. "building block" companies, suffered a data breach, such as one that disclosed their social security numbers or sensitive financial information, consumers could erroneously associate that breach with Block and its BLOCK Marks, resulting in significant harm to Block. For example, earlier this year, the media reported that some consumers' accounts on the Block, Inc.'s Cash App were hacked, and that the consumers lost all of the money in their accounts. *See* Alexis Keenan, "Square's Cash App vulnerable to hackers, customers claim: 'They're completely ghosting you'," YAHOO! FINANCE (Mar. 20, 2021), available at <https://www.yahoo.com/now/squares-cash-app-vulnerable-to-hackers-customers-claim->

113556593.html. Now that Square has changed its name to Block, reports like this in the future will be headlined: “Block’s Cash App vulnerable to hackers”—a headline that would be devastating to Block’s reputation.

46. We therefore seek an injunction to prevent irreparable harm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Kansas City, Missouri on this 21st day of December, 2021.



Jeffrey J. Jones II